

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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CHRISHAWN JOHNSON and GAVIN  
BRANDT, individually and on behalf of all  
similarly situated individuals,

Plaintiffs,

v.

THOMSON REUTERS d/b/a FINDLAW,

Defendant.

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Court File No. 0:18-cv-00070-PJS-HB

**PLAINTIFFS' MOTION FOR  
APPROVAL OF FLSA  
SETTLEMENT**

Plaintiffs, Chrishawn Johnson and Gavin Brandt, individually and on behalf of all similarly situated individuals (collectively, the “Plaintiffs”), by and through their undersigned counsel, hereby respectfully submit this Motion to Approve the FLSA Settlement. Specifically, Plaintiffs move for an order granting approval of the Parties’ settlement agreement and release of claims under the Fair Labor Standards Act (“Settlement Agreement”). In support of this Motion, Plaintiffs have filed concurrently herewith a Memorandum in Support of Motion for Approval of FLSA Settlement.

As more fully discussed in the accompanying memorandum, Plaintiffs respectfully submit that the settlement, as set forth in the Settlement Agreement, is a fair and reasonable resolution of a *bona fide* dispute between the Parties and is in the best interest of the Plaintiffs and members of the Collective Group, and that requirements of approval have been satisfied.

The terms of the settlement are fully set forth within the Settlement Agreement and Release, which is filed as an exhibit to the declaration of Shawn J. Wanta. By and through

this Motion, Plaintiffs respectfully request that the Court approve the settlement of the FLSA claims, which is necessary for there to be a valid and enforceable release.

For the reasons discussed and addressed in the memorandum, Plaintiffs respectfully requests an Order approving the Settlement Agreement between the Parties as the settlement agreement is fair, reasonable, adequate, and in the best interests of the Parties.

Dated: December 14, 2018

Respectfully submitted,

s/Shawn J. Wanta

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